

7. Do Agencies need a NARA-approved record schedule to implement FDMS or to convert electronic rulemaking records from an older system to FDMS?

No. While it is necessary for agencies to have an approved schedule to DESTROY records, or to transfer them to the National Archives when they are no longer needed in the agency, it is not necessary to have an approved schedule to implement FDMS or to convert agency business processes to electronic recordkeeping.

8. If an Agency has a records schedule for electronic docket records, do they need to have it re-approved by NARA if they change systems or software?

No. The records (i.e., the content of the system) must be schedule for disposition, not the software that operates the system. As system software changes, it is the responsibility of the agency to migrate the electronic records to new platforms, operating systems, and software versions.